UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JIN MING LIN, CHI WAI CHAO, YOOK THAI CHEAH, MING F. FUNG, MUOI GIANG, YUEN YUE SOOHOO, and MEI ZHI,))))
Plaintiffs, v.	Civil Action No. 09-11510-GAO
CHINATOWN RESTAURANT CORP., and JOYCE P.Y. HAYES,)))
Defendants.)))

PLAINTIFFS' MOTION IN LIMINE TO PRECLUDE POSSIBLE CONSEQUENCES OF VERDICT

Plaintiffs move this Honorable Court to preclude Defendants from making any references or argument at trial to the possibility that Defendants would have to lay off workers, or that the Restaurant would be unprofitable, or that Defendants may have to file for bankruptcy if Plaintiffs are victorious.

The jury should not be in a position of choosing to follow the Court's instructions on the law, or defying the law to preserve a company's hypothetical future profitability. Such evidence would be not only be purely speculative but it is also irrelevant and unduly prejudicial, and should be excluded under F.R.E. 402 and 403.

RESPECTFULLY SUBMITTED,

For Plaintiffs

By their attorneys,

/s/ Myong J. Joun

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Dated: October 19, 2012

CERTIFICATE OF SERVICE

I certify that on this day I caused a true copy of the above document to be served upon the attorney of record for all parties via CM/ECF.

Date: 10/19/2012 /s/Myong J. Joun Myong J. Joun